

**From:** gillic louise

**Sent:** 20 July 2023 14:49

**To:** Planning

**Cc:** David Fowler; save museum street; Helen Mc Murray; Albert Beale

**Subject:** FORMAL OBJECTION TO PLANNING REFERENCE 2023/2510 / P and 2023/2653/L

I wish to object to the above Planning Applications.

The first part of my Objection relates to contraventions of Camden Council's Local Plan:

The above Development contravenes Camden Council's own priorities for the area. Attached is a document highlighting Policy Guidelines contained in The Camden Local Plan that must be considered and be seen to be considered during the decision making process. I would like to draw your attention to Camden Council's own policies regarding the protection of Heritage/Conservation Areas, the priority that is to be given to Housing in all Developments (the above Development only has provision for 11 social housing units), the lack of Community Facilities, Open Spaces and other facilities such as Child Care and Camden's policy regarding refitting of buildings as opposed to complete demolition.

The following are Material Objections:

1. The principle of the Development clashes with local Planning Policy.
2. There is a lack of need for the Development. There are adjoining office blocks in the immediate area and outward that are not 100% occupied.
3. The size and density of the structure overshadows neighbouring properties and threatens their privacy. The Development is overbearing and out of scale when compared with buildings surrounding it. The Development's proposed height would interrupt the current sky line and set a precedent for future Developments.
4. Harm to the Host Building. The development and alterations damages it's integrity due to its size, shape and the materials used.
5. The Development will have a detrimental impact on neighbouring Amenities. The Local Authority is obliged to protect the living standards of local residents.

6. Poor Quality of Accommodation. There is a requirement for a decent amount of natural light in all habitable rooms which is not provided in the proposed Development.
7. Negative effect on Character and Appearance. The proposed Development would have an adverse effect on the area's character and appearance and alter the pattern of Development in this Conservation Area.
8. The scheme intends to demolish the Travelodge tower and replace it with a brand new much bigger office block. Demolition is contrary to the climate change policies of the UK, Greater London Council and Camden, all of which advocate retrofitting. An expert report proves retrofit is possible.

Can you please provide confirmation that my Formal Objection to the proposed Development has been registered and will appear on all Notification of Objections documents.

Louise Gillic  
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## **OBJECTION TO PLANNING REFERENCE 2023/2510/ P and 2023/2653/L**

### **Camden Local Plan**

1.1 The Camden Local Plan sets out the Council's planning policies and replaces the Core Strategy and Development Policies planning documents (adopted in 2010). ***It ensures that Camden continues to have robust, effective and upto-date planning policies that respond to changing circumstances and the borough's unique characteristics and contribute to delivering the Camden Plan and other local priorities.*** The Local Plan will cover the period from 2016-2031. 1.2 The Local Plan will play an essential role in the delivery of the Camden Plan, which sets out the Council's vision for the borough, through 5 strategic objectives as set out in para 1.34. The Local Plan in particular will help deliver the objectives of creating the conditions for harnessing the benefits of economic growth, reducing inequality and securing sustainable neighbourhoods. It will also assist the delivery of other plans and strategies prepared by the Council and other service bodies, for example master plans and planning briefs. Camden's development plan 1.3 The Local Plan is a key document in Camden's development plan, which is the name given to the group of documents that set out the Council's planning policies. ***The Council's decisions on planning applications should be taken in line with its development plan unless there are significant matters (material considerations) that indicate otherwise.***

### **Maintaining a successful economy and improving opportunities**

1.25 ...The Council wants to maintain and strengthen Camden's economy and competitiveness, ***whilst ensuring our communities benefit from this and we keep the borough's special identity.***

1.30 Camden has many attractive and historic neighbourhoods (such as Hampstead, Highgate, Primrose Hill and ***Bloomsbury***) ...These contribute greatly to the attractiveness of the borough. ***We need to make sure that the growth and change respects the character, heritage and distinctiveness of Camden's valued and special places.***

### **Strategic objectives Camden Plan objectives Local Plan policy**

1. To create the conditions for growth, ensuring it takes place in the most appropriate and sustainable locations ***and minimises the impacts of development***, and to harness the benefits of this growth so it meets the needs of Camden's communities for homes, jobs and services ***and preserves and enhances the borough's unique character and appearance.*** 1, 2, 3 G1 H1, H2, H4, H6, H7, E1, A1, A2, D1, D2, CC1, TC1, T1.

7. To promote high quality, safe and sustainably designed buildings, places and streets and ***preserve and enhance the unique character of Camden and the distinctiveness of our conservation areas and our other historic and valued buildings, spaces and places.*** 1, 2, 3 D1, D2, A1, CC1, CC2, CC3.

12. To promote and ***protect the high levels of amenity and quality of life that makes Camden such an attractive, successful and vibrant place for residents, workers and visitors.*** 3 D1, A1.

### **Policy G1 Delivery and location of growth**

The Council will create the conditions for growth to deliver the **homes**, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

Delivery of growth The Council will deliver growth by ***securing high quality development and promoting the most efficient use of land and buildings in Camden by:***

- a. supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;***
- b. resisting development that makes inefficient use of Camden's limited land;***
- c. expecting the provision of a mix of uses where appropriate, in particular in the most accessible parts of the borough, including an element of self-contained housing where possible; and***
- d. supporting a mix of uses either on site or across multiple sites as part of an agreed coordinated development approach, where it can be demonstrated that this contributes towards achieving the strategic objectives and delivers the greatest benefit to the key priorities of the Plan.***

***The Council will require development in the growth areas, other highly accessible and CIP areas to be consistent with the area priorities and principles set out below.***

2.4 Camden is a suitable, attractive and sustainable place for growth with its high quality places and excellent transport connections giving it high levels of accessibility. ***We recognise, however, that there is limited land in Camden to accommodate this growth and so there is a need to use Camden's land more efficiently to ensure that it delivers the objectives of this plan and the priorities set out below.***

2.6 Key priorities for delivering growth and harnessing its benefits include but are not limited to:

- ***securing self-contained housing as the priority use of the Local Plan, including sufficient affordable housing to meet the needs of our residents***

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- ensuring that growth is delivered in a way that ***protects amenity. Camden's high level of amenity (the features of a place that contributes to its attractiveness and enjoyment as a place to live) is a major part of successfully promoting and managing growth in Camden. We will require developments to avoid harmful effects on amenity of existing and future occupiers and nearby properties, or where possible, to take appropriate measures to minimise potential negative impacts.***

### **Managing the impact of Development.**

Delivering growth

Making the most of our limited land

***2.7 We will promote the most efficient use of Camden's land and buildings while also seeking to improve the quality of our environment, protect the amenity of occupiers and neighbours and meet its other planning objectives.***

### **Density**

***2.8 The Council wants to encourage high quality developments with high densities (i.e. the most homes or rooms that can appropriately be delivered in a given site area) to make the most efficient use of Camden's land and buildings, particularly in the most accessible parts of the borough (generally, the growth areas, Central London and town centres of Camden Town, Finchley Road / Swiss Cottage, Kilburn High Road, and West Hampstead).***

2.9 The Council will expect the density of housing development to take account of the density ranges set out in the London Plan's Sustainability Residential Quality density matrix (Table 3.2) and will refer primarily to dwelling densities measured in units per hectare. As Camden is generally well served by public transport, the Council will generally expect densities towards the higher end of the appropriate density range in the matrix, ***subject to taking into account all aspects of local character including heritage assets***, protected views and open spaces ***and having regard to the boroughs acute housing needs***. Further detail on our approach to density is set out in Policy H1 Maximising housing supply

2.10 Tall buildings are one form of high density development that can be appropriate for some uses and in some locations, subject to excellent design, protection of strategic views, good public transport accessibility and ***consideration of the impact on the surrounding area.***

Further detail on our approach to tall buildings is set out in Policy D1 Design. 2.11 Good design can increase density while protecting and enhancing the character of an area (Please see Policy D1 Design and Policy D2 Heritage for more detail on our approach to design and heritage).

All development should be of excellent design quality and ***should sensitively consider the amenity of occupiers and neighbours and, particularly in conservation areas, the character, heritage and built form of its surroundings.***

2.13 The Council will encourage the provision of a mix of uses in suitable locations and expect development proposals of an appropriate size in growth areas, ***Central London*** and the town centres of Camden Town, Finchley Road / Swiss Cottage and Kilburn High Road ***to contribute towards meeting Camden's pressing need for self-contained housing (see Policy H2 Maximising the supply of self-contained housing from mixed-use schemes for further guidance on mixed use). This reflects the designation of self-contained housing as the priority land use of the Plan (see Policy H1 Maximising housing supply for maximising the supply of self-contained housing).*** The Council's Site Allocations document and Area Action Plans identify development sites and provide guidance for their future development, including where mixed use development is appropriate. Multi-site proposals

## **Growth areas**

2.19 A significant proportion of Camden's growth up to 2031 is expected to be delivered in the six identified growth areas of King's Cross, Euston, ***Tottenham Court Road, Holborn***, West Hampstead Interchange, and Kentish Town Regis Road. The first five of these areas are identified in the London Plan as Opportunity Areas or Areas for Intensification.

## **Priorities for growth areas**

2.22 The Council will expect development in the growth areas to meet the objectives of this plan and the identified priorities below. It should ***maximise site opportunities*** and the opportunities and benefits for the borough and the local area, in particular in terms of jobs, ***homes and facilities for the community***, within the context of the full range of Camden's planning policies as set out in this plan and the Council's other planning documents. 2.23 Our Camden Site Allocations document and Euston Area Plan also identify significant development opportunities within the growth areas. ***The identified sites are expected to deliver a significant proportion of the increase in homes*** and jobs in the growth areas. These documents also set out Council's aspirations for the individual sites in more detail

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**2.24 It is important to note that the growth areas are next to, and sometimes include, existing residential communities and heritage assets such as conservation areas. Development must therefore take account of its sensitive context.** Further details on the specific growth areas and priorities are set out in more detail below.

2.29 Development within the Tottenham Court Road growth area should contribute to the Council's wider vision and objectives for this part of the borough. Our aspirations include: • a balanced mix of uses, **including housing and affordable housing**, significant provision of offices and other employment opportunities, **community facilities**, and retail to support the Central London Frontages of Charing Cross Road, Tottenham Court Road and the western end of New Oxford Street; • an excellent public realm, with an improved network of safe and attractive places and routes for pedestrians and cyclists, that successfully links to neighbouring areas (particularly the growth area at Holborn (see below), Covent Garden, Bloomsbury and Oxford Street) and reduces the dominance of traffic in the area, complementing the West End Project transport scheme; • maximising densities compatible with local context, sustainable design principles and public transport capacity; • **development of the highest quality, as befits this historic area in the heart of London, which preserves local amenity and seeks to enhance and conserve the significance of heritage assets such as the character and appearance of conservation areas**; and • remedying the lack of open space in the area through on-site provision or contributions to assist in the provision of new spaces.

2.30 The area is predominantly commercial, with a small residential community focused around Holborn underground station. High Holborn, from New Oxford Street to Holborn Circus, and most of Kingsway are designated as Central London Frontages, recognising their role as a shopping and service centre for workers and residents. **Some of the area and much of its immediate surroundings are designated as conservation area.** The area lies close to the growth area at Tottenham Court Road (see above). 2.31 The Council's aspirations for the Holborn area include:

- provision of a mix of land uses, with offices and **housing** as the predominate uses
- **high quality, sustainable design that respects its surroundings and conserves and enhances the area's heritage assets and wider historic environment;**

2.44 The Council will generally expect larger developments in the highly accessible areas to include a mix of uses. However, **it is important that all development in these locations is of a size and nature compatible with its site and the character of its surroundings and the wider area.**

**2.45 Camden's highly accessible areas often include, or are adjacent to, residential communities and conservation areas and other heritage assets. Development in these locations must therefore take into account the full range of relevant Plan policies and**

**objectives, in particular those on amenity, design and heritage**, sustainability, community safety, open space and transport.

2.52 The Council recognises the unique role, character and challenges of Central London in particular in balancing its economic, social and cultural role and will support and promote the area as a successful and vibrant part of the capital to live in, work in and visit. We will:

- **support Central London as a focus for Camden's future growth in homes (including affordable housing)**, offices, shops, hotels and other uses and ensure adequate infrastructure, including transport, utilities and digital, is in place to support this growth;
- economic, social and cultural role **while meeting the needs of local residents and respecting their quality of life**;
- **support residential communities within Central London by protecting amenity**, promoting improved community safety and **supporting community facilities**;
- **preserve and enhance the area's historic environment**;
- **promote and protect areas of specialist activity, such as the Museum Street area and Hatton Garden and take into account the specific identity of the areas within Central London when taking decisions on planning applications and in relevant initiatives and works**;

2.53 The borough's town centres are considered to be suitable locations for the provision of **homes**, shops, food, drink and entertainment uses, offices, community facilities and are particularly suitable for uses that are likely to significantly increase the demand for travel. They are considered to be suitable 36 Camden Local Plan | Growth and spatial strategy for higher density developments **provided that they are of high quality, contribute to the character of the area taking into account conservation areas and other heritage assets and the full range of relevant Council policies and objectives**.

#### Policy H1 Maximising housing supply

The Council will aim to secure a sufficient supply of homes to meet the needs of existing and future households by maximising the supply of housing and exceeding a target of 16,800 additional homes from 2016/17 - 2030/31, including 11,130 additional self-contained homes. **We will seek to exceed the target for additional homes, particularly self-contained homes by:**  
**a. regarding self-contained housing as the priority land-use of the Local Plan;**

#### Maximising housing supply

3.15 As noted in paragraph 3.12, the London Plan 2015 indicates that the number of additional homes needed across London exceeds the identified capacity for additional homes by at least 7,000 per year. The London Plan also indicates that the on the basis of short-term trends, **the**



***capital's need for housing could be as high as 62,000 homes per year, 20,000 more than the identified capacity. Consequently, there is a need for all London boroughs to maximise housing delivery.***

3.34 The density matrix should be seen as a guide rather than a prescriptive tool, and will be applied flexibly ***taking into account all aspects of local character including heritage assets, protected views and open spaces, whilst also having regard to the borough's acute housing needs. To respect local character we will expect developers to explore whether increased density can best be achieved through the use of medium rise development and traditional urban forms rather than focussing only on high rise options. We will also recognise that it may be appropriate to exceed or fall below the relevant density range on certain sites where this is justified by context and form of the development.***

### **Health Impact Assessments**

4.9 The scope of a HIA will vary depending on the size of the development and its location. The ***HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities.***

### **Policy C2 Community facilities**

***The Council will work with its partners to ensure that community facilities and services are developed and modernised to meet the changing needs of our community and reflect new approaches to the delivery of services. The Council will: a. seek planning obligations to secure new and improved community facilities and services to mitigate the impact of developments. The Council may also fund improvements to community facilities using receipts from the Community Infrastructure Levy where this is identified on the Council's CIL funding list;***

***b. expect a developer proposing additional floorspace in community use, or a new community facility, to reach agreement with the Council on its continuing maintenance and other future funding requirements;***

***c. ensure that facilities provide access to a service on foot and by sustainable modes of travel; d. facilitate multi-purpose community facilities and the secure sharing or extended use of facilities that can be accessed by the wider community, except for facilities occupied by the emergency services due to their distinct operating needs; e. support the investment plans of educational, health, scientific and research bodies to expand and enhance their operations, taking into account the social and economic benefits they generate for Camden, London and the UK. In assessing proposals, the Council will also balance the impact proposals may have on residential amenity and transport infrastructure;***

***f. seek the inclusion of measures which address the needs of community groups and foster community integration;***

***g. ensure existing community facilities are retained recognising their benefit to the community, including protected groups, unless one of the following tests is met: i. a replacement facility of a similar nature is provided that meets the needs of the local population or its current, or intended, users; ii. the existing premises are no longer required or viable in their existing use and there is no alternative community use capable of meeting the needs of the local area. Where it has been demonstrated to the Council's satisfaction there is no reasonable prospect of a community use, then our preferred alternative will be the maximum viable amount of affordable housing; h. take into account listing or nomination of 'Assets of Community Value' as a material planning consideration and encourage communities to nominate Assets of Community Value.***

***4.29 Providers of new community provision are encouraged to engage early in the development process with ward members and local communities, including Neighbourhood Forums where they exist. This ensures that local people can meaningfully input into a scheme's development.***

#### **Child care facilities**

4.35 There is a wide range of nursery education and childcare options in Camden. These include children's centres operated by Camden Council, those run by local primary schools and nurseries operated by the independent, voluntary and private sector. Childcare provision is an important means of tackling the Borough's inequalities as a lack of childcare can prevent our residents from taking up employment opportunities or restrict parents to part-time work close to home. ***The Council will, therefore, encourage non-residential developments to include provision for child care facilities.***

#### **Policy E2 Employment premises and sites**

f. the proposed premises include floorspace suitable for start-ups, small and medium-sized enterprises, such as managed affordable workspace where viable; g. the scheme would increase employment opportunities for local residents, including training and apprenticeships; h. the scheme includes other priority uses, such as ***housing, affordable housing and open space***, where relevant, and where this would not prejudice the continued operation of businesses on the site; and i. for larger employment sites, ***any redevelopment is part of a comprehensive scheme.***

#### **Redevelopment of sites that are suitable for continued business use**

5.40 Where premises or sites are suitable for continued business use, the Council will consider higher intensity redevelopment schemes which improve functional efficiency, maintain or, preferably, increase the amount of employment floorspace and number of jobs **and provide other priority uses, such as housing (and, in particular, affordable housing), community facilities and open space**, where this would not prejudice the continued operation of businesses on the site. ***The reprovided employment floorspace on the proposal site should be designed flexibly to be able to accommodate a range of business types and sizes, in particular small and medium-sized enterprises (SMEs) and businesses in growth sectors such as the creative industries. The provision of affordable workspaces will be particularly welcomed***